

**CCMEC**

**CALIFORNIA CEMENT MANUFACTURERS ENVIRONMENTAL COALITION**  
TXI Riverside Cement, Post Office Box 51479, Ontario, CA 91761-0079, Phone: 909/635-1826

April 28, 2011

Ms. Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
1001 I Street, Sacramento, CA 95814



Re: Comment Letter - Draft Industrial General Permit

Dear Ms. Townsend:

The California Cement Manufacturers Environmental Coalition (CCMEC), consisting of environmental professionals representing all cement manufacturers in California, appreciates the opportunity to comment on the draft Statewide General National Pollutant Discharge Elimination System (NPDES) Permit for the Discharge of Storm Water Associated with Industrial Activities (Industrial General Permit).

CCMEC's review of the draft permit requirements associated with industrial activities with respect to cement plants concludes the permit requirements are overly burdensome, far outweigh the alleged benefits and, as such, are an abuse of discretion. The average annual cost to comply with the monitoring requirements result in \$70,000 or more depending on the climate conditions of the cement facility's location. Moreover, the costs of monitoring pales in comparison to the costs associated with the fundamentally excessive capital improvements necessary to comply with the proposed discharge limits set forth in the permit requirements. CCMEC estimates that facility improvements could reach \$14,000,000 per site due to the complexity and size of a cement plant operation.

Based on the foregoing, it is apparent that the Board failed to consider the economic impact of the proposed permit requirements on the cement industry. Currently the industry is suffering from the worst decline in demand due to the downturn of the construction market in this state's history. Effectively, all cement plants in California are operating at less than fifty percent capacity resulting in significant financial hardship for this industry and its employees. Other state regulatory entities, such as the California Air Resources Board, in formulating its regulations governing greenhouse gas emissions has considered the economic impacts on the cement industry to ensure California's demand for cement is not going to be met by imports, which have been proven to be less environmentally friendly than domestic production. Additionally, CCMEC would suggest that the Board be aware of and take into consideration that the draft permit requirements would be additional to new federal and state regulations. Cumulatively, these proposals could threaten the viability of the California cement industry.

Accordingly, we respectfully request the Board and its staff restart the development of the permit process. Additionally, we encourage the Board and staff to establish the development of a permit which is cost-effective and workable. Such a process should

**CalPortland Company - Cemex, Inc. -  
Lehigh Cement Company - Mitsubishi Cement - National Cement - TXI Riverside Cement**

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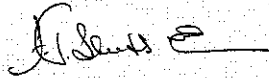
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be conducted in an open forum allowing all stakeholders the ability to provide appropriate input to the Board Members and the appropriate staff.

Thank you for your consideration.

Sincerely,



Frank T. Sheets, III  
Chair, California Cement Manufacturers Environmental Coalition

cc: Mr. Charles R. Hoppin, Chair, State Water Resources Control Board  
Ms. Frances Spivy-Weber, Vice Chair, State Water Resources Control Board  
Ms. Tam M. Doduc, Board Member, State Water Resources Control Board  
Ms. Linda Adams, California Environmental Protection Agency  
Ms. Patty Zwarts, California Environmental Protection Agency  
Mr. Mike Rogge, California Manufacturers and Technology Association